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Attorney for Defendant
HUGO RAMIREZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUGO RAMIREZ, et al.

Defendants.

No. Cr. S-05-0090 WBS

STIPULATED BRIEFING SCHEDULE
AND [PROPOSED] ORDER AND
EXCLUSION OF TIME

The United States of America, through Assistant U.S. Attorney Matthew D. Segal, defendant Hugo Ramirez, through his counsel Scott L. Tedmon, and defendant Jayson Edwards, through his counsel Mark Reichel, hereby stipulate that the current briefing schedule be vacated and the following briefing schedule be adopted. Scott L. Tedmon, counsel for defendant Hugo Ramirez, recently received approximately 300 pages of additional discovery. As such, counsel for defendant Ramirez needs additional time to review this new discovery, conduct research and investigation, confer with his client, and prepare any motion to be filed. The proposed briefing schedule is as follows:

_____ Defendants shall file and serve all motions by October 19, 2005.

Government's response shall be filed and served by November 2, 2005.

Defendants reply shall be filed and served by November 16, 2005.

1 The non-evidentiary hearing date on motions shall be November 30, 2005 at 9:00 a.m.

2 If necessary, any subsequent evidentiary hearing date shall be set at the November 30, 2005
3 court appearance. Sally Hoover has approved the foregoing schedule. No trial date has been set in
4 this case.

5 **SPEEDY TRIAL ACT - EXCLUSION OF TIME**

6 The parties stipulate that time should be excluded through November 30, 2005 under the
7 Speedy Trial Act based on the needs of counsel to prepare for any motion. 18 U.S.C.
8 §3161(h)(8)(B)(iv); Local Code T4. The parties stipulate and agree that the interests of justice
9 served by granting this continuance outweigh the best interests of the public and the defendant in a
10 speedy trial. 18 U.S.C. § 3161(h)(8)(A).

11 Finally, Scott L. Tedmon has been authorized by all counsel to sign this stipulation on their
12 behalf.

13 **IT IS SO STIPULATED.**

14 DATED: September 23, 2005

McGREGOR W. SCOTT
United States Attorney

15 /s/ Matthew D. Segal
16 MATTHEW D. SEGAL
Assistant U.S. Attorney

17 DATED: September 23, 2005

LAW OFFICES OF SCOTT L. TEDMON

18 /s/ Scott L. Tedmon
19 SCOTT L. TEDMON
Attorney for Hugo Ramirez

20 DATED: September 23, 2005

FEDERAL DEFENDER'S OFFICE

21 /s/ Mark Reichel
22 MARK REICHEL
Attorney for Jayson Edwards

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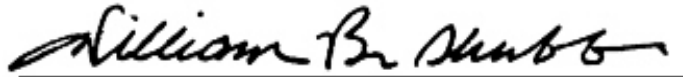
ORDER

GOOD CAUSE APPEARING and based upon the above stipulation, IT IS HEREBY ORDERED that the amended briefing schedule set forth above is hereby adopted.

Based upon the above stipulation, IT IS FURTHER ORDERED that time be excluded under the Speedy Trial Act for needs of counsel to prepare pursuant to 18 U.S.C. §3161(h)(8)(B)(iv), Local Code T4, through November 30, 2005, the date of the hearing on the motions. The Court finds that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

IT IS SO ORDERED.

DATED: September 26, 2005



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE